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9 Attorneys for Defendant and Counter-claimant
10 COOLIT SYSTEMS, INC. and Defendants
CORSAIR GAMING, INC. and CORSAIR
MEMORY, INC.

17 ASETEK DANMARK A/S,

18 Plaintiff and
Counter-defendant,

19 v.

20 COOLIT SYSTEMS, INC.,

21 Defendant and
Counter-claimant,

22 CORSAIR GAMING, INC. and CORSAIR
MEMORY, INC.,

23 Defendants.

Case No. 3:19-cv-00410-EMC

**DECLARATION OF REUBEN H. CHEN IN
SUPPORT OF DEFENDANTS' NOTICE OF
MOTION AND MOTION TO STRIKE EXHIBIT
275**

1 I, Reuben H. Chen, do hereby declare as follows:

2 1. I am an attorney licensed to practice before this Court and all courts of the State of
3 California, and am a partner with Cooley LLP, counsel for Defendant and Counter-claimant CoolIT
4 Systems, Inc. (“CoolIT”), Defendant Corsair Gaming, Inc., and Defendant Corsair Memory, Inc.
5 (collectively, “Defendants”) in the above-entitled action. I submit this declaration in support of
6 Defendants’ Notice of Motion and Motion to Strike Exhibit 275. The matters stated herein are based
7 upon my personal knowledge, and if called as a witness, I would testify as to the following statements.

8 2. Attached hereto as **Exhibit 1** is a true and correct copy of the Expert Report of Dr.
9 David B. Tuckerman Regarding Invalidity of U.S. Patent Nos. 8,746,330; 9,603,284; and 10,274,266,
10 served on November 3, 2021.

11 3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the deposition
12 transcript of Dr. David Tuckerman, conducted December 20, 2021. Relevant portions of the deposition
13 transcript have been highlighted for the convenience of the Court.

14 3. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the deposition
15 transcript of Dr. David Tuckerman, conducted March 18, 2021. Relevant portions of the deposition
16 transcript have been highlighted for the convenience of the Court.

17 3. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the Expert
18 Report of Himanshu Pokharna, Ph.D. In Response to Dr. Tuckerman’s Report on Invalidity of U.S.
19 Patent Nos. 8,746,330; 9,603,284; and 10,274, 266, served on December 8, 2021.

20 3. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the deposition
21 transcript of Dr. David Tuckerman, conducted December 22, 2021. Relevant portions of the
22 deposition transcript have been highlighted for the convenience of the Court.

23 4. Attached hereto as **Exhibit 6** is a true and correct copy of CoolIT’s Second Set of
24 Requests For Production of Documents and Things to Asetek (Nos. 99-109), dated September 20,
25 2019.

26 5. Attached hereto as **Exhibit 7** is a true and correct copy of Asetek’s Objections and
27 Responses to CoolIT’s Second Set of Requests For Production of Documents and Things to Asetek

1 (Nos. 99-109).

2 6. Attached hereto as **Exhibit 8** is a true and correct copy of the Materials Considered
3 list from the Expert Report of Dr. David B. Tuckerman Regarding Invalidity of U.S. Patent Nos.
4 8,746,330; 9,603,284; and 10,274,266, served on November 3, 2021.

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6 I declare under penalty of perjury under the laws of the United States that the foregoing is true
7 and correct to the best of my knowledge.

8 EXECUTED at Sunnyvale, California on this 31st day of March, 2022.
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10

11 /s/ Reuben H. Chen
12 Reuben H. Chen
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